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**Before the  
Common Carrier Bureau of the  
Federal Communications Commission**

In the matter of

**DOCKET FILE COPY ORIGINAL**

Maine Public Utilities Commission's  
Petition for Additional Authority  
To Implement Number Conservation  
Measures

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File No. NSD L-99-27  
DA 99-638

*CC DOCKET 96-98*

**Received**

**MAY 19 1999**

Common Carrier Bureau  
Network Service Division  
Office of the Chief

**Comments of Mid-Maine Communications  
in Support of the Petition of the  
Maine Public Utilities Commission  
for Additional Authority to Implement  
Number Conservation Measures**

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List A B C D E

Mid-Maine Communications, a member of the United States Telephone Association, wishes to make the following comments with respect to the petition of the Maine Public Utilities Commission for more authority to implement number conservation measures.

Mid-Maine Communications (Mid-Maine, hereinafter) operates two entities affected by the subject matter of the Maine PUC's petition. One is Mid-Maine Telecom, an Independent incumbent local exchange carrier with a franchised local service area in central Maine. The other is Mid-Maine TelPlus, a competitive local exchange carrier with a service area coincident with the Bell Atlantic franchised service area within Maine. Mid-Maine Telecom is a "small-company" member of the United States Telephone Association (USTA), which has filed comments opposing the Maine PUC's petition. These comments of Mid-Maine, in supporting the Maine PUC's petition, take exception to the comments of the USTA.

The government of the State of Maine, through its elected representatives and executive, and also through its administrative bodies charged with responsibility in this area, has determined that, *for Maine*, the preservation of our existing single area code is of significant economic importance. There is substantial popular support for this position among the state's citizenry. The Maine PUC's petition recognizes that what seems important in Maine may not seem important in other states. It is for that very reason that the comprehensive national approach advocated by USTA for number conservation may be exactly the *wrong* approach for this particular problem, as applied in Maine's case.

Mid-Maine believes that the interests of neither the incumbent local exchange carriers operating in Maine, nor the emerging competitive local exchange carriers seeking to do business in Maine, are best served by the approach being advocated by USTA. Rather, a proper respect to the perceived interests of the people of Maine would suggest that an approach specifically tailored to that jurisdiction be developed if it is reasonably possible. The Maine PUC is the agency best positioned to put such an approach into effect; and that body is well positioned to look after the competing interests of all parties with an interest in that jurisdiction.

Mid-Maine is concerned by that part of the FCC's rule that allows states to undertake number conservation measures only *after* an area code split or overlay has been agreed to. This cart-before-the-horse approach defeats the purpose for which number conservation would have been implemented in Maine. Mid-Maine believes that more effective number conservation can be realized by allowing the Maine PUC to implement number conservation measures within the state *in advance* of the need to implement changes in area code coverage. Furthermore, such measures can be undertaken within Maine in a manner that is not disruptive of the industry's pursuit of broader, national, long-term solutions to number conservation issues.

Here in Maine (as elsewhere, no doubt), the pressure on our existing single area code is the result of new entrants requesting assignment of NXXs for each rate center area in which they propose to serve. Several local exchange carriers are involved in a search for an "interim unassigned number portability" solution, with the objective of eliminating the wasteful assignment of NXXs in areas where the new entrants may have only a handful of customers. Mid-Maine believes that this effort, which is being directed by the Maine PUC Staff, is about to bear fruit. That being the case, the Maine PUC should have the authority to implement its solution. No great change to the telephone network will be required to implement the solution under consideration; and certainly no national objectives or interests will be threatened by the plan.

Nothing in these comments should be understood to disagree with USTA's support for full and fair cost recovery for Local Number Portability (LNP) implementation, or for USTA's positions on other related issues. However, in this matter, Mid-Maine must take exception to the position taken by its trade association.

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